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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<hr/>	:	
In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	Jointly Administered
	:	
<hr/>	:	
LEHMAN BROTHERS HOLDINGS INC. and	:	Adversary Proceeding
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	
	:	No. 13-01554 (SCC)
Plaintiffs-Counterclaim	:	
Defendants,	:	
	:	
v.	:	
	:	
GIANTS STADIUM LLC,	:	
	:	
Defendant-Counterclaim	:	
Plaintiff.	:	
<hr/>	:	

**DECLARATION OF THOMAS C. WHITE IN
SUPPORT OF MOTION TO CONSOLIDATE CONTESTED MATTER WITH
ADVERSARY PROCEEDING AND FOR RELATED RELIEF**

THOMAS C. WHITE hereby declares:

1. I am a member of the Bar of this Court and an Associate at Sullivan & Cromwell LLP, attorneys for Giants Stadium LLC (“Giants Stadium”). I submit this declaration to provide the Court with documents that are not in controversy and which are cited in Giants Stadium’s Motion to Consolidate Contested Matter with Adversary Proceeding and for Related Relief.

2. Attached hereto as Exhibit A is a true and correct copy of a letter, dated September 11, 2014, from counsel for Giants Stadium to counsel for Lehman Brothers Holdings Inc. and Lehman Brothers Special Financing Inc. (together, “Debtors”).

3. Attached hereto as Exhibit B is a true and correct copy of a letter, dated October 2, 2014, from counsel for Debtors to counsel for Giants Stadium.

4. Attached hereto as Exhibit C is a true and correct copy of a subpoena, dated October 16, 2014, served by Debtors on New York Football Giants, Inc.

5. Attached hereto as Exhibit D is a true and correct copy of a subpoena, dated October 16, 2014, served by Debtors on Sullivan & Cromwell LLP.

Executed on this 24th day of October, 2014, in New York, New York.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Thomas C. White
Thomas C. White